

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GESTURE TECHNOLOGY
PARTNERS, LLC,

Plaintiff

v.

HUAWEI DEVICE CO., LTD.,
HUAWEI DEVICE USA, INC.,

Defendants.

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CASE NO. 2:21-cv-00040-JRG
(Lead Case)

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JURY TRIAL DEMANDED

GESTURE TECHNOLOGY
PARTNERS, LLC,

Plaintiff

v.

SAMSUNG ELECTRONICS CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

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CASE NO. 2:21-cv-00041-JRG
(Member Case)

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JURY TRIAL DEMANDED

**DECLARATION OF RADHESH DEVENDRAN IN SUPPORT OF DEFENDANTS
SAMSUNG ELECTRONICS CO., LTD. AND SAMSUNG ELECTRONICS AMERICA,
INC.’S MOTION FOR RECONSIDERATION OF THE COURT’S CLAIM
CONSTRUCTION ORDER (DKT. 93) ON THE “FORWARD FACING” TERMS**

I, Radhesh Devendran, hereby declare as follows:

1. I am an attorney at the law firm Paul Hastings LLP, counsel of record for Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. in this action. I have personal knowledge of the facts herein and, if called as a witness, I could and would testify competently as to their truth.

2. Attached hereto as Exhibit A is a true and correct copy of the Patent Owner's Preliminary Response filed in IPR2021-00921 on September 15, 2021.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 26th day of October, 2021 in Palo Alto, California.

/s/ Radhesh Devendran

Radhesh Devendran